

Fill in this information to identify the case:

Debtor1 Jennifer Santiago

Debtor 2  
(Spouse, if filing)

United States Bankruptcy Court for the : EASTERN District of Pennsylvania  
(State)

Case number 19-12198-amc

## Form 4100R Response to Notice of Final Cure

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

### Part 1: Mortgage Information

Name of creditor: Legacy Mortgage Asset Trust 2021-GS1

Court claim no. (if known): 7-2

Last 4 digits of any number you use to identify the debtor's account: 9498

Property address: 3311N LAWRENCE ST  
Number Street

PHILADELPHIA, PA 19140  
City State ZIP Code

### Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full amount required to cure the prepetition default on the creditor's claim
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$ \_\_\_\_\_

### Part 3: Postpetition Mortgage

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 7/1/2024  
MM/DD/YYYY

- ☐ Creditor states that the debtors are not current on all postpetition payments consistent with § 1322 (b)(5) of the Bankruptcy Code, including all fees charges expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_

b. Total fees, charges, expenses, escrow and costs outstanding: + (b) \$ \_\_\_\_\_

c. Total. Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM/ DD/ YYYY

Debtor 1

Jennifer Santiago  
First Name Middle Name Last Name

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Case Number (if known)

19-12198-amc

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☒ all payments received;  
☒ all fees, costs, escrow, and expenses assessed to the mortgage; and  
☒ all amounts the creditor contends remain unpaid

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim**

Check the appropriate box:

- ☐ I am the creditor.  
☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

**X** /s/ Michelle L. McGowan  
Signature

Date 6/17/2024

Print Michelle L. McGowan  
First Name Middle Name Last Name Title Authorized Agent

Company Robertson, Anschutz, Schneid, Crane & Partners, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 13010 Morris Rd., Suite 450  
Number Street  
Alpharetta, GA 30004  
City State ZIP Code

Contact 470-321-7112

Email mimcgowan@raslg.com

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on June 17, 2024 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

Jennifer Santiago  
3311 N Lawrence Street  
Philadelphia, PA 19140

And via electronic mail to:

MICHAEL A. CIBIK  
Cibik Law, P.C.  
1500 Walnut Street  
Suite 900  
Philadelphia, PA 19102

SCOTT F. WATERMAN [Chapter 13]  
Chapter 13 Trustee  
2901 St. Lawrence Ave.  
Suite 100  
Reading, PA 19606

United States Trustee  
Office of the U.S. Trustee  
Robert N.C. Nix Federal Building  
Suite 320  
Philadelphia, PA 19107

By: /s/ Justine Bennett  
Justine Bennett  
Email: Jusbennett@raslg.com